

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

IN RE GOOGLE INC. COOKIE
PLACEMENT CONSUMER PRIVACY
LITIGATION

C.A. 12-MD-2358 (SLR)

This Document Relates to:
All Actions

**MOTION TO DISMISS OF DEFENDANTS MEDIA INNOVATION GROUP, LLC
AND WPP PLC FOR FAILURE TO STATE A CLAIM**

Defendants Media Innovation Group, LLC (“MIG”) and WPP plc (“WPP”) hereby respectfully move the Court for an order dismissing Plaintiffs’ claims against them under the Electronic Communications Privacy Act, 18, U.S.C. § 2510 *et seq.*, the Stored Communications Act, 18 U.S.C. § 2701 *et seq.*, and the Computer Fraud and Abuse Act, 18 U.S.C. § 1030, pursuant to Federal Rule of Civil Procedure 12(b)(6) for failure to state a claim. The bases for this motion are set forth in MIG and WPP’s Opening Brief filed herewith.

A proposed order is attached to this Motion.

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May 1, 2013

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**[PROPOSED] ORDER GRANTING THE MOTION TO DISMISS OF
MEDIA INNOVATION GROUP, LLC AND WPP PLC**

Before the Court is the motion by Defendants Media Innovation Group, LLC (“MIG”) and WPP plc (“WPP”) to dismiss the claims asserted against them in the consolidated class action complaint (the “Motion”). Having considered the Motion and all papers submitted in relation thereto, the Court hereby GRANTS the Motion. The claims asserted against MIG and WPP in the consolidated class action complaint are DISMISSED WITH PREJUDICE.

SO ORDERED this ____ day of May 2013.

The Honorable Sue L. Robinson
United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that on May 1, 2013, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on May 1, 2013, upon the following in the manner indicated:

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